

James E. Cecchi  
Lindsey H. Taylor  
Caroline F. Bartlett  
CARELLA, BYRNE, CECCHI  
OLSTEIN, BRODY & AGNELLO  
5 Becker Farm Road  
Roseland, New Jersey 07068  
(973) 994-1700  
*Attorneys for Demand Futile Plaintiffs*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE JOHNSON & JOHNSON DERIVATIVE  
LITIGATION

Civil Action No. 10-2033 (FLW)

IN RE JOHNSON & JOHNSON FCPA  
SHAREHOLDER DERIVATIVE LITIGATION

Civil Action No. 11-2511 (FLW)

COPELAND v. PRINCE, *et al.*

Civil Action No. 11-4993 (FLW)

**ATTACHING DECLARATION OF JAMES E. CECCHI**

I, JAMES E. CECCHI, of full age, hereby declare as follows:

1. I am an attorney licensed to practice in New Jersey and am a member of the law firm of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C. I submit this declaration in support of Plaintiffs' Motion for Final Approval of Derivative Litigation Settlement and Award of Attorney's Fees and Reimbursement of Expenses.

2. Annexed hereto as Exhibit 1 is a summary chart reflecting the total loadstar and expenses incurred by the four Court-appointed Co-Lead Counsel in the consolidated Demand

Futility Actions and the Court-appointed Lead and Liaison Counsel in the consolidated Demand Refused Actions (as those terms are defined in the Stipulation and Agreement of Settlement (No. 10-2033, Docket No. 181-2)) (collectively “Plaintiffs’ Counsel”). In total, Plaintiffs’ Counsel have expended 10,975.5 hours prosecuting these cases since their inception in early 2010, and have incurred lodestar in the amount of \$6,614,268.25. In addition, Plaintiffs’ Counsel incurred a total of \$452,016.76 in reimbursable expenses.

3. As set forth below, annexed hereto as Exhibits 2 through 7 are the declarations of each of the Plaintiffs’ Counsel firms. While other firms performed work in connection with the Derivative Actions, Plaintiffs’ Counsel are only submitting lodestar and expense information for their firms, which performed the principle work in litigating the Derivative Actions. Plaintiffs’ Counsel have done so to avoid burdening the Court with excessive and unnecessary detail, and because Plaintiffs’ Counsel respectfully believe that the time submissions reflected in the attached declarations more than substantiate the quantum of fee requested. Nevertheless, Plaintiffs’ Counsel intend to make payment from any fee awarded to other firms who also performed work in the Derivative Actions.

4. Annexed hereto as Exhibits 2-7 are declarations from of each firm that has performed common benefit work in the Derivative Actions.

5. Specifically, annexed hereto as Exhibit 2 is the Declaration of James E. Cecchi setting forth the lodestar and reimbursable expenses of Carella, Byrne, Cecchi, Olstein, Brody & Agnello, P.C

6. Annexed hereto as Exhibit 3 is the Declaration of Mark Lebovitch setting forth the lodestar and reimbursable expenses of Bernstein Litowitz Berger & Grossmann LLP.

7. Annexed hereto as Exhibit 4 is the Declaration of Karen L. Morris setting forth the lodestar and reimbursable expenses of Morris and Morris LLC Counselors at Law.

8. Annexed hereto as Exhibit 5 is the Declaration of Jeffrey S. Abraham setting forth the lodestar and reimbursable expenses of Abraham, Fruchter & Twersky, LLP.

9. Annexed hereto as Exhibit 6 is the Declaration of Travis E. Downs and David W. Mitchell setting forth the lodestar and reimbursable expenses of Robbins Geller Rudman & Dowd LLP.

10. Annexed hereto as Exhibit 7 is the Declaration of Gary S. Graifman setting forth the lodestar and reimbursable expenses of Kantrowitz, Goldhamer & Graifman, P.C.

11. Attached hereto as Exhibit 8 is the Joint Declaration of James E. Cecchi, Mark Lebovitch, Karen L. Morris, Travis Downs, Jeffrey S. Abraham, and Gary S. Graifman in Support of Final Approval of Proposed Settlement and Approval of Award of Requested Attorney's Fees and Reimbursement of Expenses.

12. Annexed hereto as Exhibit 9 is the Declaration of Harvey L. Pitt in Support of Settlement.

13. Annexed hereto as Exhibit 10 is the Report of Dr. Mitchell Glass in Support of Settlement of the Johnson & Johnson Derivative Actions.

14. Annexed hereto as Exhibit 11 is the court's order in *In re BP PLC Derivative Litig.*, No. 3AN-06-11929CI, slip op. (Al. Sup. Ct. May 7, 2008).

15. Annexed hereto as Exhibit 12 is the court's order in *City of Pontiac Gen. Employees' Ret. Sys. v. Langone*, No. 2006-cv-122302, slip op. (Fulton County, Ga. June 10, 2008).

16. Annexed hereto as Exhibit 13 is the court's order in *In re Fed. Home Loan Mortg. Corp. Sec. & Derivative Litig.* ("Freddie Mac"), MDL 1584, Case Nos. 05-cv-2596 & 04-cv-2634 (S.D.N.Y. Oct. 26, 2006).

I hereby declare under penalty of perjury that the foregoing is true and correct.

\_\_\_\_\_  
/s/ James E. Cecchi  
\_\_\_\_\_  
JAMES E. CECCHI

Dated: August 31, 2012